

UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE:

CREDITRON FINANCIAL CORPORATION,  
d/b/a TELATRON MARKETING GROUP,  
INC.

Debtor.

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JOHN C. MELARAGNO,  
CHAPTER 11 TRUSTEE,

Movant,

v.

DOLLAR BANK; UNITED STATES OF  
AMERICA, INTERNAL REVENUE  
SERVICE; AND THE COMMONWEALTH  
OF PENNSYLVANIA, OFFICE OF THE  
ATTORNEY GENERAL;  
COLUMBUS DEPOT EQUIPMENT  
COMPANY;  
PITNEY BOWES;  
SCHWAB;  
TELESALES SERVICES, LLC;  
BANK OF AMERICA;  
RED TETTEMER & PARTNERS;  
GE MONEY;  
STATE FARM BANK;  
NATIONAL FUEL GAS DISTRIBUTION  
CORP.;  
MAVERICK NETWORK SOLUTIONS;  
MOBILE WARRANTY CORPORATION;  
OPTIMA DIRECT;  
SCORE MARKETING; AND  
TERNIAN INSURANCE GROUP.

Respondents.

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CASE NO. 08-11289-TPA

CHAPTER 11

Document No. \_\_\_\_\_

JUDGE AGRESTI

**AMENDED MOTION FOR EXPEDITED HEARING  
ON MOTION FOR ORDER APPROVING (I) BIDDING PROCEDURES RELATED TO  
THE SALE OF SUBSTANTIALLY ALL OF DEBTOR'S PERSONAL PROPERTY; AND  
(II) FORM AND MANNER OF SALE NOTICE**

AND NOW, to-wit, this 13<sup>th</sup> day of July, 2011, comes John C. Melaragno, Chapter 11 Trustee, of Creditron Financial Corporation dba Telatron Marketing Group,

Inc., and files this Motion requesting Expedited Hearing on Motion For Order Approving (i) Bidding Procedures Related To The Sale Of Substantially All Of Debtor's Personal Property;And (ii) Form And Manner Of Sale Notice, averring in support thereof as:

1. The Trustee requests that the Court schedule an expedited hearing on the instant Motion. Cause exists for an expedited hearing because: (a) the Stalking Horse APA requires a closing as soon as possible after the entry of an Order Approving the Sale. In this case, it is critical that the sale happen quickly in order to preserve the value of the Debtor and its customer accounts and (b) it is necessary for the Debtor to properly serve the Sale Motion and notice of the sale hearing well in advance of the hearing date.

2. The reason that a sale is consummated quickly is that one of the Debtor's largest customers has indicated that it intends to significantly reduce the workload of the Debtor and phase-out the use of the Debtor by the end of the year.

3. It is believed and therefore averred that this customer has put the phase-out plan into place because of the uncertainty of the sale process and its ultimate impact upon the performance of the services rendered by the Debtor to the customer.

4. The Trustee has taken all available steps to attempt to reassure the customer and to involve the customer in the sale process, however, the customer is unwilling to participate in the process and has continued to indicate that it intends to phase-out the business by year-end.

5. The Trustee believes that if a sale is approved expeditiously and the purchaser can take over operations, then the purchaser will be able to verify for the customer that there is no need to phase-out the business.

6. The ultimate purchase price to be paid as set forth in the APA is directly tied to whether or not the customer phases out the business with the Debtor.

7. Based upon the foregoing, the Trustee believes that it is imperative to move the sale forward as quickly as possible.

8. It is believed and therefore averred that an expedited hearing and a reduction in the response time would not prejudice anyone.

WHEREFORE, the Trustee respectfully requests that this Honorable Court enter Order setting an expedited hearing for the Court to consider the Trustee's Motion For Order Approving (i) Bidding Procedures Related To The Sale Of Substantially All Of Debtor's Personal Property; and (ii) Form And Manner Of Sale Notice.

Respectfully submitted,

MELARAGNO & PLACIDI

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